

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	
	:	
vs.	:	Case No. 2:21-mj-639
	:	
REBECCA ALLARD,	:	MAGISTRATE JUDGE VASCURA
Defendant.	:	

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

Now comes the defendant, Rebecca Allard, through counsel and moves this Court to modify her conditions of release (ECF #7) to allow for Ms. Allard to submit an affidavit attesting to her loss of her passport. AUSA Noah Litton does not oppose the motion.

Respectfully submitted,

DEBORAH L. WILLIAMS  
FEDERAL PUBLIC DEFENDER

/s/ Stacey MacDonald  
Stacey MacDonald (WA 35394)  
Assistant Federal Public Defender  
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Attorney for Defendant  
Rebecca Allard

**MEMORANDUM IN SUPPORT OF MOTION**

On October 4, 2021 Ms. Allard was charged by complaint with Making a False Statement to Acquire a Firearm pursuant to 18 U.S.C. § 922 (a)(6). She was ordered release on October 4, 2021. *See* ECF No. 7, Conditions of Release. Ms. Allard was ordered to surrender her passport by October 7, 2021. Ms. Allard contacted counsel on October 7, 2021 that she had been unable to locate her passport which is currently expired. Ms. Allard had recently moved into a new apartment on September 10, 2021.

Defense requests to modify the conditions of release to allow for Ms. Allard to submit an affidavit attesting to her loss of her expired passport in lieu of the requirement that she turn the passport into the Clerk's office.

**WHEREFORE**, for the reasons set forth above, Defendant Rebecca Allard respectfully requests this Court grant this motion to modify the conditions of his release to allow for her to submit an affidavit documenting her loss of passport.

Respectfully submitted,

DEBORAH L. WILLIAMS  
FEDERAL PUBLIC DEFENDER

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Attorney for Defendant  
Rebecca Allard

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Stacey MacDonald  
Stacey MacDonald (WA 35394)  
Assistant Federal Public Defender